

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA

EDNA SELAN EPSTEIN, Individually and on )	Civil Action No. 6:14-cv-01606-MGL
Behalf of All Others Similarly Situated, )	
Plaintiff, )	<u>CLASS ACTION</u>
vs. )	LEAD PLAINTIFF'S COUNSEL'S NOTICE
OF MOTION AND MOTION FOR AN )	AWARD OF ATTORNEYS' FEES AND
WORLD ACCEPTANCE CORPORATION, et )	EXPENSES AND AWARD TO LEAD
al., )	PLAINTIFF PURSUANT TO 15 U.S.C. §78u-
Defendants. )	4(a)(4)
_____ )	

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that Robbins Geller Rudman & Dowd LLP, Court-appointed Lead Counsel, and Motley Rice LLC, Court-appointed Liaison Counsel, and counsel for Lead Plaintiff Operating Engineers Construction Industry and Miscellaneous Pension Fund will move this Court on December 18, 2017, at 11:00 a.m., before the Honorable Mary Geiger Lewis, for entry of an order, pursuant to Rules 23 and 54 of the Federal Rules of Civil Procedure: (1) awarding attorneys' fees; (2) paying litigation expenses incurred in prosecuting the Litigation; and (3) awarding Lead Plaintiff compensation for its time and service representing the Settlement Class in this action. This motion is based on: (i) the Memorandum of Law in Support of Lead Plaintiff's Counsel's Motion for an Award of Attorneys' Fees and Expenses and Award to Lead Plaintiff Pursuant to 15 U.S.C. §78u-4(a)(4); (ii) the Declaration of Jack Reise in Support of: (1) Lead Plaintiff's Motion for Final Approval of Class Action Settlement and Approval of Plan of

Allocation, and (2) Lead Plaintiff's Counsel's Motion for an Award of Attorneys' Fees and Expenses and Award to Lead Plaintiff Pursuant to 15 U.S.C. §78u-4(a)(4); (iii) the Declaration of Alexander P. Villanova; (iv) the Declaration of Lead Counsel; (v) the Declaration of Liaison Counsel; (vi) the Declaration of Lead Plaintiff; (vii) the Stipulation of Settlement; and (viii) all other proceedings herein.

A proposed order will be submitted with counsel's reply submission on or before December 1, 2017.

DATED: November 3, 2017

Respectfully submitted,

MOTLEY RICE LLC  
WILLIAM P. TINKLER (D.S.C. Bar No. 11794)  
MARLON E. KIMPSON (D.S.C. Bar No. 7487)

*/s/ William P. Tinkler*  
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